

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,

v.

JAMES COYNE,
Defendant.

)
)
)
)
)
)

Case No. 2:16-cr-00154-wks-1

DECLARATION OF JOHN SHEHAN

I, JOHN SHEHAN, hereby state and declare as follows:

1. I am currently employed as Vice President of the Exploited Children Division ("ECD") at The National Center for Missing and Exploited Children® ("NCMEC"). I have been employed by NCMEC since February 2000. As Vice President, I am responsible for supervising NCMEC's CyberTipline®. I am familiar with the operations of the CyberTipline, including the procedures involving the receipt and processing of reports by NCMEC and the procedures used to generate and maintain reports. The information contained in this declaration is based on my own personal knowledge and information to which I have access in my role as Vice President of ECD for NCMEC.

I. NCMEC Background

2. NCMEC is a private, nonprofit corporation, incorporated under the laws of the District of Columbia. It was created to help find missing children, reduce child sexual exploitation, and prevent child victimization. NCMEC serves as the national clearinghouse for families, victims, private industry, law enforcement, and other professionals on information and programs related to missing and exploited children issues. NCMEC employs over 340 individuals and works with hundreds of volunteers to facilitate outreach and community child safety events nationwide.

3. Like other large nonprofits, NCMEC receives federal grant and private foundation funding, corporate financial and in-kind donations, and private individual donations to maintain and enhance its programs of work, including conducting community safety presentations, working with



corporate and photo partners to disseminate posters of missing children, providing prevention resource materials and curricula to educators and schools, and engaging with parents, families, social service agencies, law enforcement, and schools on issues relating to missing and exploited children.

4. NCMEC receives millions of dollars in private funding and in-kind donations from corporations and individuals and works closely with its corporate partners to develop educational programs and materials to keep children safe. For instance, Disney sponsors NCMEC's Educator Online Training Program, a self-paced online training program to help schools teach Internet safety and good digital citizenship to children; Old Navy sponsors child ID and child safety informational events for its customers; and Honeywell sponsors KidSmartz[®], a child safety program that educates families about preventing abduction and empowering children in grades K-5 to practice safer behaviors. NCMEC also works with over 250 corporate partners to disseminate photos of missing children to millions of homes across the United States each week.

II. NCMEC's CyberTipline

5. NCMEC began operating the CyberTipline on March 9, 1998, to serve as the national online clearinghouse for tips and leads about child sexual exploitation. The CyberTipline (www.missingkids.org/cybertipline) was developed to further NCMEC's private mission of helping prevent and diminish the sexual exploitation of children by allowing the public and electronic service providers ("ESPs") to report online (and via toll-free telephone) the enticement of children for sexual acts, extra-familial child sexual molestation, child pornography, child sex tourism, child sex trafficking, unsolicited obscene materials sent to a child, misleading domain names, misleading words or digital images on the Internet.

6. A secure CyberTipline was created in February 2000 to facilitate the reporting of apparent child pornography by ESPs. Once registered with NCMEC, ESPs can upload files relating to child sexual exploitation content when making reports to NCMEC using a secure electronic connection. Uploaded image files may include images, video or other reported content.

7. Neither the government nor any law enforcement agency created the CyberTipline or has input into CyberTipline operations. The government does not instigate, direct or provide guidance to NCMEC in its processing of CyberTipline reports.

8. NCMEC began operating the CyberTipline before any federal legislation referred to the CyberTipline. The infrastructure of the CyberTipline was built from a private corporate donation from Sun Microsystems, Inc. that included hardware, software, and programming.

9. NCMEC staff cannot alter or change information submitted by a reporting ESP. NCMEC does not direct or mandate the type of information that an ESP may choose to submit in a CyberTipline report, but instead provides voluntary reporting fields that ESPs may populate with information, including uploading apparent child pornography image files.

10. One of the voluntary reporting fields NCMEC makes available to ESPs is “Was File Reviewed by the Company?” contained in Section A of the CyberTipline report. A reporting ESP may voluntarily provide information in this field to indicate whether or not it reviewed an uploaded file prior to submitting a CyberTipline report to NCMEC. At the time these reports were received, if the ESP chose to provide this information and answered in the affirmative, then this field would automatically populate into Section A of the CyberTipline report. If the ESP chose not to voluntarily provide information in this field, then the field would not appear in the CyberTipline report. The CyberTipline process currently in use allows ESPs to voluntarily populate this field by answering in the affirmative or the negative and both answers will automatically populate in this field in Section A of the CyberTipline report.

11. Another voluntary reporting field NCMEC makes available to ESPs is “Image Categorization by ESP” contained in Sections A and B of the CyberTipline report. Image categorization is a voluntary initiative created and operated by ESPs in which ESPs will have categorized images depending on the age of the victim and content depicted. If a reporting ESP chooses to provide information related to the image categorization of an uploaded image file, then this field will

automatically populate into Sections A and B of the CyberTipline report. If the ESP chooses not to voluntarily populate this field, then this field will not appear in the CyberTipline report.

12. NCMEC's systems may conduct publicly-available automated processes on the information submitted by the ESP contained in Section A. The information found in Section B of the CyberTipline Report contains the data automatically generated by NCMEC systems.

13. After an ESP makes a CyberTipline report to NCMEC, a staff member uses conventional and publicly-available open source tools to try to identify potential geographic information pertaining to the individual who is the subject of the report as well as geographic information of the ESP potentially used in connection with the reported image files.

14. Section C of the CyberTipline report contains internal records, open-source and publicly-accessible query results identified by NCMEC staff.

15. NCMEC is required only to make CyberTipline reports available to law enforcement. NCMEC is not required to open reported image files or review any content provided by a member of the public or an ESP in a CyberTipline report. If NCMEC independently decides to open a reported image file or review the contents of a CyberTipline report, it does so pursuant to its internal organizational and operational guidelines and in furtherance of its private mission to aid children.

16. NCMEC does not open or view every image file submitted in a CyberTipline report. Pursuant to NCMEC's current review process, NCMEC staff make an independent determination whether to open reported image files based on operational factors, including but not limited to the volume of reports, whether a child might be in imminent danger, and the need to determine a potential geographic location of a child victim or reported user. As of June 10, 2017, NCMEC has received over 21.2 million CyberTipline reports, including both international and domestic reports. Based on the volume of CyberTipline reports NCMEC receives, it is not possible to review all reports much less all image files.

17. After an ECD staff member has determined a potential geographic location and completed processing the CyberTipline report, the report is made available to a law enforcement agency in the potential geographic location for independent review and potential investigation. CyberTipline

reports are made available to law enforcement in this way through the use of a secure virtual private network owned and operated by NCMEC.

III. CyberTipline Report 11614028

18. I have reviewed CyberTipline report 11614028 submitted to NCMEC by Microsoft - SBO on May 20, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline report 11614028.

19. The uploaded file identified in Section A of CyberTipline report 11614028 contains the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for the uploaded file.

20. The uploaded file identified in Section A of CyberTipline report 11614028 contains the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded file is contained in Sections A and B of CyberTipline report 11614028.

21. As indicated in Section C of CyberTipline report 11614028, NCMEC staff reviewed the file uploaded and designated as reviewed by Microsoft - SBO.

IV. CyberTipline Reports 11751258 and 11751259

22. I have reviewed CyberTipline reports 11751258 and 11751259 submitted to NCMEC by Microsoft - SBO on May 23, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 11751258 and 11751259.

23. The uploaded files identified in Section A of CyberTipline reports 11751258 and 11751259 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

24. The uploaded files identified in Section A of CyberTipline reports 11751258 and 11751259 contain the voluntary reporting field "Image Categorization by ESP." Information related to

the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 11751258 and 11751259.

25. As indicated in Section C of CyberTipline reports 11751258 and 11751259, NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

V. CyberTipline Report 11855790

26. I have reviewed CyberTipline report 11855790 submitted to NCMEC by Microsoft - SBO on May 26, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline report 11855790.

27. The uploaded file identified in Section A of CyberTipline report 11855790 contains the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for the uploaded file.

28. The uploaded file identified in Section A of CyberTipline report 11855790 contains the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded file is contained in Sections A and B of CyberTipline report 11855790.

29. As indicated in Section C of CyberTipline report 11855790, NCMEC staff reviewed the file uploaded and designated as reviewed by Microsoft - SBO.

VI. CyberTipline Reports 12045016, 12050728, 12050735, 12050739, 12051516, and 12051925

30. I have reviewed CyberTipline reports 12045016, 12050728, 12050735, 12050739, 12051516, and 12051925 submitted to NCMEC by Microsoft - SBO on May 31, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12045016, 12050728, 12050735, 12050739, 12051516, and 12051925.

31. The uploaded files identified in Section A of CyberTipline reports 12045016, 12050728, 12050735, 12050739, 12051516, and 12051925 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

32. The uploaded files identified in Section A of CyberTipline reports 12045016, 12050728, 12050735, 12050739, 12051516, and 12051925 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12045016, 12050728, 12050735, 12050739, 12051516, and 12051925.

33. As indicated in Section C of CyberTipline reports 12045016, 12050728, 12050735, 12050739, 12051516, and 12051925 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

VII. CyberTipline Reports 12114079, 12114080, 12114081, and 12116763

34. I have reviewed CyberTipline reports 12114079, 12114080, 12114081, and 12116763 submitted to NCMEC by Microsoft - SBO on June 2, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12114079, 12114080, 12114081, and 12116763.

35. The uploaded files identified in Section A of CyberTipline reports 12114079, 12114080, 12114081, and 12116763 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

36. The uploaded files identified in Section A of CyberTipline reports 12114079, 12114080, 12114081, and 12116763 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12114079, 12114080, 12114081, and 12116763.

37. As indicated in Section C of CyberTipline reports 12114079, 12114080, 12114081, and 12116763 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

VIII. CyberTipline Reports 12415510, 12415511, 12415578, and 12415755

38. I have reviewed CyberTipline reports 12415510, 12415511, 12415578, and 12415755 submitted to NCMEC by Microsoft - SBO on June 13, 2016 in which Microsoft - SBO reported an

individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12415510, 12415511, 12415578, and 12415755.

39. The uploaded files identified in Section A of CyberTipline reports 12415510, 12415511, 12415578, and 12415755 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

40. The uploaded files identified in Section A of CyberTipline reports 12415510, 12415511, 12415578, and 12415755 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12415510, 12415511, 12415578, and 12415755.

41. As indicated in Section C of CyberTipline reports 12415510, 12415511, 12415578, and 12415755 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

IX. CyberTipline Reports 12468560, 12468566, 12469951, 12469960, 12469962, and 12469964

42. I have reviewed CyberTipline reports 12468560, 12468566, 12469951, 12469960, 12469962, and 12469964 submitted to NCMEC by Microsoft - SBO on June 15, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12468560, 12468566, 12469951, 12469960, 12469962, and 12469964.

43. The uploaded files identified in Section A of CyberTipline reports 12468560, 12468566, 12469951, 12469960, 12469962, and 12469964 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

44. The uploaded files identified in Section A of CyberTipline reports 12468560, 12468566, 12469951, 12469960, 12469962, and 12469964 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12468560, 12468566, 12469951, 12469960, 12469962, and 12469964.

45. As indicated in Section C of CyberTipline reports 12468560, 12468566, 12469951, 12469960, 12469962, and 12469964 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

X. CyberTipline Reports 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, and 12526153

46. I have reviewed CyberTipline reports 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, and 12526153 submitted to NCMEC by Microsoft - SBO on June 17, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, and 12526153.

47. The uploaded files identified in Section A of CyberTipline reports 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, and 12526153 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

48. The uploaded files identified in Section A of CyberTipline reports 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, and 12526153 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, and 12526153.

49. As indicated in Section C of CyberTipline reports 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, and 12526153 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XI. CyberTipline Reports 12627552, 12627584, and 12627589

50. I have reviewed CyberTipline reports 12627552, 12627584, and 12627589 submitted to NCMEC by Microsoft - SBO on June 21, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12627552, 12627584, and 12627589.

51. The uploaded files identified in Section A of CyberTipline reports 12627552, 12627584, and 12627589 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

52. The uploaded files identified in Section A of CyberTipline reports 12627552, 12627584, and 12627589 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12627552, 12627584, and 12627589.

53. As indicated in Section C of CyberTipline reports 12627552, 12627584, and 12627589 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XII. CyberTipline Reports 12651690, 12651697, and 12651701

54. I have reviewed CyberTipline reports 12651690, 12651697, and 12651701 submitted to NCMEC by Microsoft - SBO on June 22, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12651690, 12651697, and 12651701.

55. The uploaded files identified in Section A of CyberTipline reports 12651690, 12651697, and 12651701 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

56. The uploaded files identified in Section A of CyberTipline reports 12651690, 12651697, and 12651701 contain the voluntary reporting field "Image Categorization by ESP." Information related

to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12651690, 12651697, and 12651701.

57. As indicated in Section C of CyberTipline reports 12651690, 12651697, and 12651701 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XIII. CyberTipline Reports 12765571, 12765579, and 12766078

58. I have reviewed CyberTipline reports 12765571, 12765579, and 12766078 submitted to NCMEC by Microsoft - SBO on June 27, 2016 in which Microsoft - SBO reported an individual using a peer to peer client name of "CVS4Skype." One (1) uploaded file is contained in CyberTipline reports 12765571, 12765579, and 12766078.

59. The uploaded file identified in Section A of CyberTipline reports 12765571, 12765579, and 12766078 contains the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

60. The uploaded files identified in Section A of CyberTipline reports 12765571, 12765579, and 12766078 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 12765571, 12765579, and 12766078.

61. As indicated in Section C of CyberTipline reports 12765571, 12765579 and 12766078 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XIV. CyberTipline Reports 13202385 and 13202393

62. I have reviewed CyberTipline reports 13202385 and 13202393 submitted to NCMEC by Microsoft - SBO on July 18, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "cjvt1412345,842e0d79f4392b0b." One (1) uploaded file is contained in CyberTipline reports 13202385 and 13202393.

63. The uploaded files identified in Section A of CyberTipline reports 13202385 and 13202393 contains the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

64. The uploaded files identified in Section A of CyberTipline reports 13202385 and 13202393 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 13202385 and 13202393.

65. As indicated in Section C of CyberTipline reports 13202385 and 13202393 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XV. CyberTipline Reports 13281876, 13281881, and 13281882

66. I have reviewed CyberTipline reports 13281876, 13281881, and 13281882 submitted to NCMEC by Microsoft - SBO on July 22, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "cjvt12345,acc278424f43a9e8." One (1) uploaded file is contained in CyberTipline reports 13281876, 13281881, and 13281882.

67. The uploaded files identified in Section A of CyberTipline reports 13281876, 13281881, and 13281882 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

68. The uploaded files identified in Section A of CyberTipline reports 13281876, 13281881, and 13281882 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 13281876, 13281881, and 13281882.

69. As indicated in Section C of CyberTipline reports 13281876, 13281881, and 13281882 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XVI. CyberTipline Reports 13337682, 13337686, and 13337689

70. I have reviewed CyberTipline reports 13337682, 13337686, and 13337689 submitted to NCMEC by Microsoft - SBO on July 25, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "cjvt123,a4ddfb1a1bf6f05c." One (1) uploaded file is contained in CyberTipline reports 13337682, 13337686, and 13337689.

71. The uploaded files identified in Section A of CyberTipline reports 13337682, 13337686, and 13337689 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

72. The uploaded files identified in Section A of CyberTipline reports 13337682, 13337686, and 13337689 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 13337682, 13337686, and 13337689.

73. As indicated in Section C of CyberTipline reports 13337682, 13337686, and 13337689 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XVII. CyberTipline Report 13395344

74. I have reviewed CyberTipline report 13395344 submitted to NCMEC by Microsoft - SBO on July 28, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "cjny123,967718d675b7ef97." One (1) uploaded file is contained in CyberTipline report 13395344.

75. The uploaded file identified in Section A of CyberTipline report 13395344 contains the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for the uploaded file.

76. The uploaded file identified in Section A of CyberTipline report 13395344 contains the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded file is contained in Sections A and B of CyberTipline report 13395344.

77. As indicated in Section C of CyberTipline report 13395344 NCMEC staff reviewed the file uploaded and designated as reviewed by Microsoft - SBO.

XVIII. CyberTipline Report 13674862

78. I have reviewed CyberTipline report 13674862 submitted to NCMEC by Microsoft - SBO on August 10, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "ash141234." One (1) uploaded file is contained in CyberTipline report 13674862.

79. The uploaded file identified in Section A of CyberTipline report 13674862 contains the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for the uploaded file.

80. The uploaded file identified in Section A of CyberTipline report 13674862 contains the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded file is contained in Sections A and B of CyberTipline report 13674862.

81. As indicated in Section C of CyberTipline report 13674862 NCMEC staff reviewed the file uploaded and designated as reviewed by Microsoft - SBO.

XIX. CyberTipline Reports 13712333 and 13712405

82. I have reviewed CyberTipline reports 13712333 and 13712405 submitted to NCMEC by Microsoft - SBO on August 12, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "madi141234." One (1) uploaded file is contained in CyberTipline reports 13712333 and 13712405.

83. The uploaded files identified in Section A of CyberTipline reports 13712333 and 13712405, contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

84. The uploaded files identified in Section A of CyberTipline reports 13712333 and 13712405 contain the voluntary reporting field "Image Categorization by ESP." Information related to

the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 13712333 and 13712405.

85. As indicated in Section C of CyberTipline reports 13712333 and 13712405, NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XX. CyberTipline Reports 13711685 and 13711825

86. I have reviewed CyberTipline reports 13711685 and 13711825 submitted to NCMEC by Microsoft - SBO on August 12, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "ash141234." One (1) uploaded file is contained in CyberTipline reports 13711685 and 13711825.

87. The uploaded files identified in Section A of CyberTipline reports 13711685 and 13711825 contain the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

88. The uploaded files identified in Section A of CyberTipline reports 13711685 and 13711825 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 13711685 and 13711825.

89. As indicated in Section C of CyberTipline reports 13711685 and 13711825, NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

XXI. CyberTipline Reports 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450

90. I have reviewed CyberTipline reports 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450 submitted to NCMEC by Microsoft - SBO on August 12, 2016 in which Microsoft - SBO reported an individual having a screen/user name of "britt14123." One (1) uploaded file is contained in CyberTipline reports 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450.

91. The uploaded files identified in Section A of CyberTipline reports 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450 contains the reporting field "Was File Reviewed by the Company?" with the answer being "Yes" for each uploaded file.

92. The uploaded file identified in Section A of CyberTipline reports 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450 contain the voluntary reporting field "Image Categorization by ESP." Information related to the image categorization of the uploaded files are contained in Sections A and B of CyberTipline reports 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450.

93. As indicated in Section C of CyberTipline reports 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450 NCMEC staff reviewed the files uploaded and designated as reviewed by Microsoft - SBO.

94. CyberTipline reports 11614028, 11751258, 11751259, 11855790, 12045016, 12050728, 12050735, 12050739, 12051516, 12051925, 12114079, 12114080, 12114081, 12116763, 12415510, 12415511, 12415578, 12415755, 12468560, 12468566, 12469951, 12469960, 12469962, 12469964, 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760, 12526153, 12627552, 12627584, 12627589, 12651690, 12651697, 12651701, 12765571, 12765579, 12766078, 13202385, 13202393, 13281876, 13281881, 13281882, 13337682, 13337686, 13337689, 13395344, 13674862, 13712333, 13712405, 13711685, 13711825, 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450 were made available to the Vermont Office of Attorney General and Homeland Security Investigations for their independent review and potential investigation.

95. To the best of my knowledge, no law enforcement agency reviewed or processed CyberTipline reports 11614028, 11751258, 11751259, 11855790, 12045016, 12050728, 12050735, 12050739, 12051516, 12051925, 12114079, 12114080, 12114081, 12116763, 12415510, 12415511, 12415578, 12415755, 12468560, 12468566, 12469951, 12469960, 12469962, 12469964, 12526149, 12526150, 12526151, 12526152, 12526153, 12526155, 12526156, 12526159, 12527752, 12527760,

12526153, 12627552, 12627584, 12627589, 12651690, 12651697, 12651701, 12765571, 12765579, 12766078, 13202385, 13202393, 13281876, 13281881, 13281882, 13337682, 13337686, 13337689, 13395344, 13674862, 13712333, 13712405, 13711685, 13711825, 13711686, 13711695, 13712041, 13712042, 13712170, and 13712450 prior to them being made available to law enforcement.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

DATED: Alexandria, Virginia, June 16, 2017.



JOHN SHEHAN

COMMONWEALTH OF VIRGINIA)
)
ALEXANDRIA CITY)

Signed and sworn to before me, a Notary Public, of Alexandria County,
Virginia, by John Shehan, on this 16th day of June, 2017.



Notary Public

